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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation,
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO CONSIDER
WHETHER ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED [DKT. 430]**

I, Michelle Woodhouse, hereby declare:

1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I provide this Declaration based on my personal knowledge and/or after a reasonable investigation of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, (Dkt. 430 (“Sealing Motion”)). Meta seeks leave to file under seal portions of Plaintiffs’ February 13, 2025 Supplemental Letter (“Plaintiffs’ Letter”) and certain portions of the accompanying materials (Dkt. 429) (collectively, “Plaintiffs’ Letter Filing”).

3. Meta requests the Court’s permission to file under seal narrowly tailored portions of Plaintiffs’ Letter Filing, as set forth in the chart below alongside the relief requested for each:

Document	Sealing Request
Woodhouse Ex. 1 – Supplemental Letter (Dkt. 430-1)	Redacted portions
Woodhouse Ex. 2 – Ex. A to the Supplemental Letter (Dkt. 430-3)	Redacted portions
Woodhouse Ex. 3 – Ex. B to the Supplemental Letter (Dkt. 430-4)	Redacted portions
Woodhouse Ex. 4 – Ex. C to the Supplemental Letter (Dkt. 430-5)	Redacted portions
Woodhouse Ex. 5 – Ex. D to the Supplemental Letter (Dkt. 430-6)	Redacted portions
Woodhouse Ex. 6 – Ex. E to the Supplemental Letter (Dkt. 430-7)	Redacted portions
Woodhouse Ex. 7 – Ex. F to the Supplemental Letter (Dkt. 430-8)	Redacted portions
Woodhouse Ex. 8 – Ex. G to the Supplemental Letter (Dkt. 430-9)	Redacted portions
Woodhouse Ex. 9 – Ex. H to the Supplemental Letter (Dkt. 430-10)	Redacted portions

Woodhouse Ex. 10 – Ex. I to the Supplemental Letter (Dkt. 430-11)	Redacted portions
Woodhouse Ex. 11 – Ex. J to the Supplemental Letter (Dkt. 430-12)	Redacted portions
Woodhouse Ex. 12 – Ex. K to the Supplemental Letter (Dkt. 430-13)	Redacted portions
Woodhouse Ex. 13 – Ex. L to the Supplemental Letter (Dkt. 430-14)	Redacted portions
Woodhouse Ex. 14 – Ex. M to the Supplemental Letter (Dkt. 430-15)	Redacted portions

Meta seeks the Court’s permission to file under seal discrete portions of **Woodhouse Exhibits 1–14**, as further explained below.

1. Attached as **Woodhouse Exhibit 1** is Plaintiffs’ Letter with Meta’s proposed narrowly tailored redactions. Here, Meta respectfully requests the Court’s permission to make a single redaction. The redaction is necessary to prevent the disclosure of Meta’s business strategies and negotiations vis-à-vis a third party, including Meta’s internal considerations regarding possible strategic partnerships. Certain of this information involves business discussions that are ongoing. Disclosure of such information risks competitive harm to Meta, including by hampering Meta’s third-party relationship management. The identity of the third-party is also subject to confidentiality and non-disclosure obligations and agreements. Disclosure of such information would put the third party’s confidential information at risk and pose a competitive disadvantage to Meta and the third party who obtained promises of confidentiality from Meta for this information and is not party to this lawsuit. Meta has previously requested to seal documents based on similar third-party information, (*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).)

2. Attached as **Woodhouse Exhibit 2** is Exhibit A to Plaintiffs’ Letter with Meta’s proposed narrowly tailored redactions. Here, Meta respectfully requests the Court’s permission to redact materials comprising employees’ personal identifiable information, namely, the email addresses for Meta’s individual employees, who are not parties to the case. Such information has

1 been redacted to protect the employees' privacy and to avoid the risk of third parties' unauthorized
2 and/or illicit use of the information, such as for automated or unwanted solicitation or contact. Meta
3 previously requested to seal documents based on the same personal identifiable information,
4 (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

5 3. Attached as **Woodhouse Exhibit 3** is Exhibit B to Plaintiffs' Letter with Meta's
6 proposed narrowly tailored redactions. Here, Meta respectfully requests the Court's permission to
7 redact materials comprising employees' personal identifiable information, namely, the email
8 addresses for Meta's individual employees, who are not parties to the case. Such information has
9 been redacted to protect the employees' privacy and to avoid the risk of third parties' unauthorized
10 and/or illicit use of the information, such as for automated or unwanted solicitation or contact. Meta
11 previously requested to seal documents based on the same personal identifiable information,
12 (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

13 4. Attached as **Woodhouse Exhibit 4** is Exhibit C to Plaintiffs' Letter with Meta's
14 proposed narrowly tailored redactions. Meta respectfully requests the Court's permission to seal
15 the redacted information for three reasons. **First**, Meta respectfully seeks to redact only
16 information necessary to prevent the disclosure of Meta's business strategies and negotiations vis-
17 à-vis third parties, including Meta's internal considerations regarding possible strategic
18 partnerships. Certain of this information involves business discussions that are ongoing.
19 Disclosure of such information risks competitive harm to Meta, including by hampering Meta's
20 third-party relationship management. The identity of the third-party is also subject to
21 confidentiality and non-disclosure obligations and agreements. Disclosure of such information
22 would put the third party's confidential information at risk and pose a competitive disadvantage to
23 Meta and the third party who obtained promises of confidentiality from Meta for this information
24 and is not party to this lawsuit. Meta has previously requested to seal documents based on similar
25 third-party information, (*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*,
26 Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).) **Second**, the redactions seek to protect
27 hyperlinks or file paths (*e.g.*, links to access Meta's internally stored documents and data) that point
28 to Meta's confidential and proprietary information and sensitive features of its internal

1 systems. These materials are maintained with restricted access in the ordinary course of Meta's
2 business and are not generally known to the public or Meta's competitors. The hyperlinks and file
3 paths have been redacted in a limited way to avoid disclosure, while preserving sufficient
4 information for the public to understand any relevance of the same. Disclosure of this confidential
5 and proprietary information about Meta's infrastructure may increase the risk of cyber security
6 threats or breaches as third parties may seek to gain access to and use the information to
7 compromise and intrude upon Meta's internal systems and other confidential information. Meta
8 previously requested to seal documents based on the same concerns regarding network security,
9 (*e.g.*, Dkt. 391-1, ¶ 9), which was granted by the Court, (*e.g.*, Dkt. 393). **Third**, Meta respectfully
10 requests the Court's permission to redact materials comprising employees' personal identifiable
11 information, namely, the email addresses for Meta's individual employees, who are not parties to
12 the case. Such information has been redacted to protect the employees' privacy and to avoid the
13 risk of third parties' unauthorized and/or illicit use of the information, such as for automated or
14 unwanted solicitation or contact. Meta previously requested to seal documents based on the same
15 personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*,
16 Dkt. 393).

17 5. Attached as **Woodhouse Exhibit 5** is Exhibit D to Plaintiffs' Letter with Meta's
18 proposed narrowly tailored redactions. Meta respectfully requests the Court's permission to seal
19 the redacted information for two reasons. **First**, Meta respectfully seeks to redact only information
20 necessary to prevent the disclosure of Meta's business strategies and negotiations vis-à-vis third
21 parties, including Meta's internal considerations regarding possible strategic partnerships. Certain
22 of this information involves business discussions that are ongoing. Disclosure of such information
23 risks competitive harm to Meta, including by hampering Meta's third-party relationship
24 management. The identity of some of the third-parties is also subject to confidentiality and non-
25 disclosure obligations and agreements. Disclosure of such information would put the third party's
26 confidential information at risk and pose a competitive disadvantage to Meta and the third party
27 who obtained promises of confidentiality from Meta for this information and is not party to this
28 lawsuit. Meta has previously requested to seal documents based on similar third-party information,

(*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).) **Second**, Meta seeks to redact materials comprising employees' personal identifiable information, namely, the email addresses for Meta's individual employees, who are not parties to the case. Such information has been redacted to protect the employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the information, such as for automated or unwanted solicitation or contact. Meta previously requested to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

6. Attached as **Woodhouse Exhibit 6** is Exhibit E to Plaintiffs' Letter with Meta's proposed narrowly tailored redactions. Meta respectfully requests the Court's permission to seal the redacted information for two reasons. **First**, Meta respectfully seeks to redact only information necessary to prevent the disclosure of Meta's business strategies and negotiations vis-à-vis third parties, including Meta's internal considerations regarding possible strategic partnerships. Certain of this information involves business discussions that are ongoing. Disclosure of such information risks competitive harm to Meta, including by hampering Meta's third-party relationship management. The identity of the third-party is also subject to confidentiality and non-disclosure obligations and agreements. Disclosure of such information would put the third party's confidential information at risk and pose a competitive disadvantage to Meta and the third party who obtained promises of confidentiality from Meta for this information and is not party to this lawsuit. Meta has previously requested to seal documents based on similar third-party information, (*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).) **Second**, Meta seeks to redact materials comprising employees' personal identifiable information, namely, the email addresses for Meta's individual employees, who are not parties to the case. Such information has been redacted to protect the employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the information, such as for automated or unwanted solicitation or contact. Meta previously requested to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

1 7. Attached as **Woodhouse Exhibit 7** is Exhibit F to Plaintiffs' Letter with Meta's
2 proposed narrowly tailored redactions. Here, Meta seeks to redact materials comprising
3 employees' personal identifiable information, namely, the email addresses for Meta's individual
4 employees, who are not parties to the case. Such information has been redacted to protect the
5 employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
6 information, such as for automated or unwanted solicitation or contact. Meta previously requested
7 to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5),
8 which was granted by the Court, (*e.g.*, Dkt. 393).

9 8. Attached as **Woodhouse Exhibit 8** is Exhibit G to Plaintiffs' Letter with Meta's
10 proposed narrowly tailored redactions. Here, Meta seeks to redact materials comprising
11 employees' personal identifiable information, namely, the email addresses for Meta's individual
12 employees, who are not parties to the case. Such information has been redacted to protect the
13 employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
14 information, such as for automated or unwanted solicitation or contact. Meta previously requested
15 to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5),
16 which was granted by the Court, (*e.g.*, Dkt. 393).

17 9. Attached as **Woodhouse Exhibit 9** is Exhibit H to Plaintiffs' Letter with Meta's
18 proposed narrowly tailored redactions. Meta respectfully requests the Court's permission to seal
19 the redacted information for three reasons. **First**, Meta respectfully seeks to redact only
20 information necessary to prevent the disclosure of Meta's business strategies and negotiations vis-
21 à-vis third parties, including Meta's internal considerations regarding possible strategic
22 partnerships. Certain of this information involves business discussions that are ongoing.
23 Disclosure of such information risks competitive harm to Meta, including by hampering Meta's
24 third-party relationship management. The identity of the third-party is also subject to
25 confidentiality and non-disclosure obligations and agreements. Disclosure of such information
26 would put the third party's confidential information at risk and pose a competitive disadvantage to
27 Meta and the third party who obtained promises of confidentiality from Meta for this information
28 and is not party to this lawsuit. Meta has previously requested to seal documents based on similar

1 third-party information, (*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*,
 2 Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).) **Second**, the redactions seek to protect
 3 hyperlinks or file paths (*e.g.*, links to access Meta’s internally stored documents and data) that point
 4 to Meta’s confidential and proprietary information and sensitive features of its internal
 5 systems. These materials are maintained with restricted access in the ordinary course of Meta’s
 6 business and are not generally known to the public or Meta’s competitors. The hyperlinks and file
 7 paths have been redacted in a limited way to avoid disclosure, while preserving sufficient
 8 information for the public to understand any relevance of the same. Disclosure of this confidential
 9 and proprietary information about Meta’s infrastructure may increase the risk of cyber security
 10 threats or breaches as third parties may seek to gain access to and use the information to
 11 compromise and intrude upon Meta’s internal systems and other confidential information. Meta
 12 previously requested to seal documents based on the same concerns regarding network security,
 13 (*e.g.*, Dkt. 391-1, ¶ 9), which was granted by the Court, (*e.g.*, Dkt. 393). **Third**, Meta seeks to
 14 redact materials comprising employees’ personal identifiable information, namely, the email
 15 addresses for Meta’s individual employees, who are not parties to the case. Such information has
 16 been redacted to protect the employees’ privacy and to avoid the risk of third parties’ unauthorized
 17 and/or illicit use of the information, such as for automated or unwanted solicitation or contact. Meta
 18 previously requested to seal documents based on the same personal identifiable information, (*e.g.*,
 19 Dkt. 391-1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

20 10. Attached as **Woodhouse Exhibit 10** is Exhibit I to Plaintiffs’ Letter with Meta’s
 21 proposed narrowly tailored redactions. Meta respectfully requests the Court’s permission to seal
 22 the redacted information for two reasons. **First**, the redactions seek to protect hyperlinks or file
 23 paths (*e.g.*, links to access Meta’s internally stored documents and data) that point to Meta’s
 24 confidential and proprietary information and sensitive features of its internal systems. These
 25 materials are maintained with restricted access in the ordinary course of Meta’s business and are
 26 not generally known to the public or Meta’s competitors. The hyperlinks and file paths have been
 27 redacted in a limited way to avoid disclosure, while preserving sufficient information for the public
 28 to understand any relevance of the same. Disclosure of this confidential and proprietary

1 information about Meta's infrastructure may increase the risk of cyber security threats or breaches
2 as third parties may seek to gain access to and use the information to compromise and intrude upon
3 Meta's internal systems and other confidential information. Meta previously requested to seal
4 documents based on the same concerns regarding network security, (*e.g.*, Dkt. 391-1, ¶ 9), which
5 was granted by the Court, (*e.g.*, Dkt. 393). **Second**, the redactions seek to protect materials
6 comprising employees' personal identifiable information, namely, the email addresses for Meta's
7 individual employees, who are not parties to the case. Such information has been redacted to
8 protect the employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use
9 of the information, such as for automated or unwanted solicitation or contact. Meta previously
10 requested to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-
11 1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

12 11. Attached as **Woodhouse Exhibit 11** is Exhibit J to Plaintiffs' Letter with Meta's
13 proposed narrowly tailored redactions. Here, Meta seeks to redact materials comprising
14 employees' personal identifiable information, namely, the email addresses for Meta's individual
15 employees, who are not parties to the case. Such information has been redacted to protect the
16 employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
17 information, such as for automated or unwanted solicitation or contact. Meta previously requested
18 to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5),
19 which was granted by the Court, (*e.g.*, Dkt. 393).

20 12. Attached as **Woodhouse Exhibit 12** is Exhibit K to Plaintiffs' Letter with Meta's
21 proposed narrowly tailored redactions. Meta respectfully requests the Court's permission to seal
22 the redacted information for two reasons. **First**, the redactions seek to protect hyperlinks or file
23 paths (*e.g.*, links to access Meta's internally stored documents and data) that point to Meta's
24 confidential and proprietary information and sensitive features of its internal systems. These
25 materials are maintained with restricted access in the ordinary course of Meta's business and are
26 not generally known to the public or Meta's competitors. The hyperlinks and file paths have been
27 redacted in a limited way to avoid disclosure, while preserving sufficient information for the public
28 to understand any relevance of the same. Disclosure of this confidential and proprietary

1 information about Meta's infrastructure may increase the risk of cyber security threats or breaches
2 as third parties may seek to gain access to and use the information to compromise and intrude upon
3 Meta's internal systems and other confidential information. Meta previously requested to seal
4 documents based on the same concerns regarding network security, (*e.g.*, Dkt. 391-1, ¶ 9), which
5 was granted by the Court, (*e.g.*, Dkt. 393). **Second**, the redactions seek to protect materials
6 comprising employees' personal identifiable information, namely, the email addresses for Meta's
7 individual employees, who are not parties to the case. Such information has been redacted to
8 protect the employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use
9 of the information, such as for automated or unwanted solicitation or contact. Meta previously
10 requested to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-
11 1, ¶ 5), which was granted by the Court, (*e.g.*, Dkt. 393).

12 13. Attached as **Woodhouse Exhibit 13** is Exhibit L to Plaintiffs' Letter with Meta's
13 proposed narrowly tailored redactions. Here, Meta seeks to redact materials comprising
14 employees' personal identifiable information, namely, the email addresses for Meta's individual
15 employees, who are not parties to the case. Such information has been redacted to protect the
16 employees' privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the
17 information, such as for automated or unwanted solicitation or contact. Meta previously requested
18 to seal documents based on the same personal identifiable information, (*e.g.*, Dkt. 391-1, ¶ 5),
19 which was granted by the Court, (*e.g.*, Dkt. 393).

20 14. Attached as **Woodhouse Exhibit 14** is Exhibit M to Plaintiffs' Letter with Meta's
21 proposed narrowly tailored redactions. Meta respectfully requests the Court's permission to seal
22 the redacted information for three reasons. **First**, Meta respectfully seeks to redact only
23 information necessary to prevent the disclosure of Meta's business strategies and negotiations vis-
24 à-vis third parties, including Meta's internal considerations regarding possible strategic
25 partnerships. Certain of this information involves business discussions that are ongoing.
26 Disclosure of such information risks competitive harm to Meta, including by hampering Meta's
27 third-party relationship management. Disclosure of such information would put the third party's
28 confidential information at risk and pose a competitive disadvantage to Meta and the third party

1 who obtained promises of confidentiality from Meta for this information and is not party to this
2 lawsuit. Meta has previously requested to seal documents based on similar third-party information,
3 (e.g., Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (e.g., Dkt. 393 (granting
4 Dkt. 391); Dkt. 414 (granting Dkt. 409).) **Second**, the redactions seek to protect hyperlinks or file
5 paths (e.g., links to access Meta's internally stored documents and data) that point to Meta's
6 confidential and proprietary information and sensitive features of its internal systems. These
7 materials are maintained with restricted access in the ordinary course of Meta's business and are
8 not generally known to the public or Meta's competitors. The hyperlinks and file paths have been
9 redacted in a limited way to avoid disclosure, while preserving sufficient information for the public
10 to understand any relevance of the same. Disclosure of this confidential and proprietary
11 information about Meta's infrastructure may increase the risk of cyber security threats or breaches
12 as third parties may seek to gain access to and use the information to compromise and intrude upon
13 Meta's internal systems and other confidential information. Meta previously requested to seal
14 documents based on the same concerns regarding network security, (e.g., Dkt. 391-1, ¶ 9), which
15 was granted by the Court, (e.g., Dkt. 393). **Third**, Meta respectfully requests the Court's
16 permission to redact materials comprising employees' personal identifiable information, namely,
17 the email addresses for Meta's individual employees, who are not parties to the case. Such
18 information has been redacted to protect the employees' privacy and to avoid the risk of third
19 parties' unauthorized and/or illicit use of the information, such as for automated or unwanted
20 solicitation or contact. Meta previously requested to seal documents based on the same personal
21 identifiable information, (e.g., Dkt. 391-1, ¶ 5), which was granted by the Court, (e.g., Dkt. 393).

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23 * * *

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed in Menlo Park, California on this 20th day of February 2025.

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5 
6 Michelle Woodhouse